

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

THE LAUREL MANAGEMENT
GROUP, LLC, and DENISE
MUELLER,

Plaintiffs,

v.

HONORABLE DAVID S. CERCONE
Case No.: 2:18-cv-1000-DSC

WHITE SHEEP CORPORATION,
and HAMISH SUTHERLAND,

Defendants.

DEFENDANT WHITE SHEEP'S FIRST MOTION FOR SANCTIONS

Defendant, White Sheep Corporation (“White Sheep”), hereby moves this Court for an order imposing sanctions against Plaintiffs, The Laurel Management Group, LLC (“Laurel Management”) and Denise Mueller, and (1) precluding them from presenting any evidence that they assisted defendant White Sheep to prepare an application for the Commonwealth of Pennsylvania, or alternatively, dismissing their action with prejudice; (2) holding Plaintiffs and their counsel in contempt of court; and (3) directing Plaintiffs or their counsel to pay defendant White Sheep’s attorneys’ fees associated with this motion. Defendant White Sheep submits the accompanying memorandum of law in support of its request for sanctions.

STRADLEY RONON STEVENS & YOUNG LLP

/s/ Elizabeth A. Kuschel

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